

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**JAMISON HAMLIN DYER**  
**Debtor**

**GALVESTON COUNTY**  
**Objector**

**vs.**

**JAMISON HAMLIN DYER**  
**Respondent**

**§ CASE NO. 24-80163**

**§**  
**§**  
**§ CHAPTER 13**

**§**  
**§**  
**§ CONTESTED MATTER**

---

**OBJECTION OF TAXING AUTHORITY TO SUMMARY PLAN CONFIRMATION**

---

**NOW COME(s)**, Galveston County (hereinafter referred to as “Taxing Authority” — the singular to include the plural), Objector, and files this Objection to Summary Plan Confirmation (the “Objection”), stating as grounds therefore the following:

**JURISDICTION**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334, *et seq*. This is a core proceeding under 28 U.S.C. §§ 157(b)(2)(L). This Objection is designated as a contested matter under Bankruptcy Rule 9014.

**PARTIES AND SERVICE**

2. The Debtor (whether one or more), has been served with a copy of this Objection pursuant to Bankruptcy Rule 7004(b)(9). If applicable, Debtor’s Counsel has also been served with a copy of this Objection at the address of record.

**PRELIMINARY STATEMENT**

3. Taxing Authority is a fully secured ad valorem tax creditor of debtor and the estate, holding

prior liens against property of the estate in the amount of **\$10,600.06**.

### OBJECTIONS

4. Taxing Authority objects to confirmation of the proposed plan on the grounds that it fails to comply with 11 U.S.C. §1329(a), specifically,

✓	Debtor's Plan fails to fully provide for Taxing Authority's claim of <b>\$10,600.06</b> .
✓	Debtor's Plan fails to provide for the retention of Taxing Authority's lien on property of the Debtor and/or of the Debtor's Estate.
	The interest rate proposed in the Debtor's plan is unreasonably low. Taxing Authority avers that its claims should be paid with interest at the rate of 12% per annum pursuant to the Texas Property Tax Code §33.01(a). Pursuant to 11 U.S.C. §511, “[i]f any provision of this title requires the payment of interest on a tax claim or on an administrative expense tax, or the payment of interest to enable a creditor to receive the present value of the allowed amount of a tax claim, the rate of interest shall be the rate determined under applicable non bankruptcy law.”
	Debtor's Plan improperly classifies Taxing Authority's allowed secured claim as a Priority Claim under 11 U.S.C. §507, et seq.
	Debtor's Plan improperly classifies Taxing Authority's allowed secured claims as a General Unsecured Claim.

**WHEREFORE, PREMISES CONSIDERED**, Taxing Authority respectfully prays that this Court sustain its Objection to Summary Plan Confirmation, that it deny confirmation of the Debtor's Plan, and for such other and further relief, at law or in equity, as is just.

Date: October 17, 2024.

Respectfully submitted,

**LINEBARGER GOGGAN  
BLAIR & SAMPSON, LLP**

*/s/ Tara L. Grundemeier*

---

Tara L. Grundemeier  
Texas State Bar No. 24036691  
Jeannie L. Andresen  
Texas State Bar No. 24086239  
Post Office Box 3064  
Houston, Texas 77253-3064  
(713) 844-3478 Telephone  
(713) 844-3503 Facsimile  
tara.grundemeier@lgbs.com  
jeannie.andresen@lgbs.com

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:

JAMISON HAMLIN DYER  
Debtor

GALVESTON COUNTY  
Objector

vs.

JAMISON HAMLIN DYER  
Respondent

§ CASE NO. 24-80163

§  
§  
§ CHAPTER 13

§  
§  
§ CONTESTED MATTER

---

CERTIFICATE OF SERVICE

---

I hereby certify that a true and correct copy of the above and foregoing Objection of Galveston County to Summary Plan Confirmation was electronically served to those registered to receive service in this matter on CM/ECF for the Bankruptcy Court for the Southern District of Texas and to the following recipients, if any, via first-class mail, on October 17, 2024.

Debtor

Jamison Hamlin Dyer  
4126 Avenue Q ½  
Galveston, Texas 77550-6915

Respectfully submitted,

*/s/ Tara L. Grundemeier*

---

Tara L. Grundemeier  
Texas State Bar No. 24036691  
Jeannie L. Andresen  
Texas State Bar No. 24086239  
Post Office Box 3064  
Houston, Texas 77253-3064  
(713) 844-3478 Telephone  
(713) 844-3503 Facsimile  
tara.grundemeier@lgbs.com  
jeannie.andresen@lgbs.com

Attorney for Debtor

Reese W. Baker  
Attorney at Law  
950 Echo Lane, Suite 300  
Houston, Texas 77024

Chapter 13 Trustee

Tiffany D. Castro  
Office of Chapter 13 Trustee  
1220 Augusta Drive, Suite 500  
Houston, TX 77057